

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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| GARY KOOPMANN, TIMOTHY KIDD and<br>VICTOR PIRNIK, Individually and on Behalf of<br>All Others Similarly Situated,                      | : | No. 15 Civ. 7199 (JMF) |
| Plaintiffs,  |   | :                      |
| v.   |   | :                      |
| FIAT CHRYSLER AUTOMOBILES N.V.,<br>FCA US LLC, SERGIO MARCHIONNE,<br>SCOTT KUNSELMAN, MICHAEL DAHL,<br>STEVE MAZURE and ROBERT E. LEE, | : |                        |
| Defendants.  |   | :                      |

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**DECLARATION OF JOSHUA S. LEVY IN SUPPORT OF  
DEFENDANTS' LETTER-MOTION TO MODIFY THE SCHEDULE**

I, Joshua S. Levy, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of this Court and am associated with the law firm of Sullivan & Cromwell LLP ("S&C"), counsel for Defendants in the above-captioned action.
2. I respectfully submit this Declaration in support of Defendants' letter-motion requesting a three-month extension of the fact discovery deadline and corresponding adjustments to later deadlines.
3. Attached hereto as Exhibit A is a true and correct copy of the transcript of a case management conference held on June 1, 2018 in *In re Chrysler-Dodge-Jeep Ecodiesel Marketing, Sales Practices, and Products Liability Litigation*, No. 17-md-2777 (N.D. Cal.) (Chen, J.).
4. Attached hereto as Exhibit B is a true and correct copy of the Judicial Panel on Multidistrict Litigation's Order Denying Transfer in *In re Chrysler-Dodge-Jeep Ecodiesel Mktg., Sales Practices, & Prod. Liab. Litig.*, MDL No. 2777 (J.P.M.L. Apr. 5, 2018).

5. Attached hereto as Exhibit C is a true and correct copy of Plaintiffs' Memordandum [*sic*] of Law in Support of Interested Party Response to Defendants' Motion to Transfer the *Prnik* [*sic*] Action to the MDL for Coordinated Pre-Trial Proceedings, dated January 9, 2018, in *In re Chrysler-Dodge-Jeep Ecodiesel Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 2777 (J.P.M.L.), ECF No. 140.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 7th day of June 2018, in New York, New York.

/s/ Joshua S. Levy

Joshua S. Levy